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Technology Co., Ltd.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BEIJING MEISHE NETWORK  
TECHNOLOGY CO., LTD.,

Plaintiff,

v.

TIKTOK INC. ET AL.,

Defendants.

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Case No. 3:23-cv-06012-SI

JOINT STIPULATION RE SCHEDULE

District Judge: Hon. Susan Illston

Pursuant to the Court's direction, Plaintiff Beijing Meishe Network Technology Co., Ltd. ("Plaintiff") and Defendants TikTok Inc., TikTok Pte. Ltd., ByteDance Ltd., and ByteDance Inc. (collectively "Defendants") (collectively "the Parties") by and through their undersigned counsel of record, hereby submit this joint stipulation requesting an amendment to the Court's schedule in the Pretrial Preparation Order, dated September 10, 2024 (Dkt. No. 492).

Specifically, the Parties request the changes below to the pre-trial schedule to permit the Parties to continue to work with the Special Master to resolve various discovery issues and to complete depositions. The proposed changes do not affect the trial date or any deadlines that directly affect the Court, such as dispositive motions. The Parties confirmed that the Special Master has no objection to the proposed schedule changes.

The Parties respectfully request that the Court enter an order implementing the schedule changes below:

DEADLINE	Current Deadline	Proposed Deadline
NON-EXPERT DISCOVERY CUTOFF	March 7, 2025	March 28, 2025
DESIGNATION OF EXPERTS	March 28, 2025	April 18, 2025
REBUTTAL	April 25, 2025	May 9, 2025
REPLY (IF NECESSARY) <sup>1</sup>	May 16, 2025	May 20, 2025
EXPERT DISCOVERY CUTOFF	June 13, 2025	unchanged

<sup>1</sup> During the December 6, 2024 Case Management Conference, the Court confirmed that the schedule included a May 16, 2025 deadline for reply expert reports to the extent these reports are necessary. This deadline was not reflected in the Court's Pretrial Preparation Order.

1 Dated: January 31, 2025

CHERIAN LLP

2 By: /s/ Robert M. Harkins  
3 Robert M. Harkins

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24 ByteDance, Inc.  
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**ATTESTATION**

Pursuant to Civ. Local Rule 5.1(i)(3) regarding signatures, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from counsel for TikTok Inc. et al.

/s/ Robert M. Harkins  
Robert M. Harkins

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 31st of January 2025, with a copy of this document via the Court's EM/ECF system.

/s/ Robert M. Harkins, Jr.  
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*Attorney for Plaintiff*